



21 Roszel Road
P.O. Box 5226
Princeton, NJ 08543-5226
609.924.0808 *main* | 609.452.1888 *fax*
www.hillwallack.com

Writer's Direct Dial: (609) 734-6310

July 8, 2021

Hon. Ann Marie Donio, U.S.M.J.
Clerk, U.S. District Court
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Jane Doe v. La'Quetta Small, et al.
Civil Action No. 1:21-cv-11189-JHR-AMD

Dear Judge Donio:

I have been requested by the joint insurance fund of defendant, Atlantic City Board of Education, to appear for its employee and defendant, La'Quetta Small, in the above matter.

Pursuant to Local Civ. Rule 6.1, I am respectfully requesting, with the consent of plaintiffs' counsel, a 20-day further extension by which Ms. Small may answer or otherwise move with respect to the complaint which will expire this date, July 8, 2021.

Per Local Civ. Rule 6.1(a)(3), Ms. Small was apparently served with the complaint on June 3, 2021 when the summons and complaint were left with a security guard at the offices of the Atlantic City Board of Education at 1300 Atlantic Avenue, Atlantic City, an address different than that endorsed upon the summons, which was 1400 N. Albany Avenue, Atlantic City. Ms. Small's answer was due on June 24, 2021. [Docket #6].

Due to service upon the Board of Education, its joint insurance fund was made aware of the service on Ms. Small and thus requested that I apply for a Clerk's order on her behalf per Local Civ. Rule 6.1(b) in order to obtain the summons and complaint from Ms. Small herself and in the interim maintain the status quo. I applied for the Clerk's order on June 21, 2021 [Docket #8] and it was granted by the Clerk and placed on the Docket on June 23, 2021. The time by which Ms. Small could answer or move with respect to the complaint therefore expires today, July 8, 2021.

July 8, 2021
Page 2

Accordingly, with plaintiffs' consent, I respectfully request a further 20-day extension of time for her to answer or otherwise move through and including July 28, 2021. I wish to thank Your Honor for your consideration of this request.

Respectfully yours,

/s/ Jeffrey L. Shanaberger

Jeffrey L. Shanaberger

JLS/pm

cc: Terrell Ratliff, Esq.
Benjamin Zieman, Esq.